

BRONSTER, LLP
Proposed Counsel for Debtor
156 West 56th Street, Suite 902
New York, New York 10019
(347) 826-5051
J. Logan Rappaport, Esq.
lrappaport@bronsterllp.com

Hearing Date: December 2, 2022
Hearing Time: 10:30 a.m.
Objection Date: November 25, 2022

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re

KENSINGTON REALTY GROUP CORP.,

Case No. 1-22-42817-ess

Debtor.

Chapter 11

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**NOTICE OF MOTION FOR ENTRY OF AN ORDER (I) DIRECTING STATE COURT
RECEIVER TO TURNOVER RENTS TO DEBTOR PURSUANT TO 11 U.S.C. § 543,
(II) AUTHORIZING DEBTOR'S USE OF CASH COLLATERAL PURSUANT TO 11
U.S.C. § 363(c)(2) AND BANKRUPTCY RULE 4001 ON AN INTERIM BASIS AND
PROVIDING ADEQUATE PROTECTION THEREFOR PURSUANT TO 11 U.S.C. §§
361 AND 362, AND (III) SCHEDULING A FINAL HEARING ON USE OF CASH
COLLATERAL**

PLEASE TAKE NOTICE, that upon the annexed application (the "Application"), dated November 16, 2022, and the supporting papers and exhibits filed in connection therewith, Kensington Realty Group Corp. ("Debtor"), the debtor and debtor-in-possession in the above-captioned Chapter 11 case, by its proposed counsel, Bronster, LLP, seeking the entry of an order: (i) pursuant to Section 543 of title 11 of the United States Code (the "Bankruptcy Code"), directing Lawrence Price of Corne Accounting, Tax, and Fiduciary Consultants LLC ("Receiver"), the state court appointed receiver with respect to Debtor's real properties located at Amersfort Place (the "Amersfort Property"), Brooklyn, New York and 2408 Clarendon Road, Brooklyn, New York (the "Clarendon Property," and together with the Amersfort Property, the

“Properties”), to turnover any and all rents and other funds in his possession, custody, and control that constitute property of the bankruptcy estate, and to file an accounting of any property of the debtor, or proceeds, product, offspring, rents, or profits of such property, that, at any time, came into his possession, custody, or control; (ii) authorizing Debtor’s use of cash collateral pursuant to 11 U.S.C. § 363(c)(2) and Rule 4001 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) on an interim basis and providing adequate protection therefor pursuant to 11 U.S.C. §§ 361 and 362, and scheduling a final hearing on use of cash collateral; and, (iii) for such other and further relief as the Court deems just and proper, there will be a hearing in the Courtroom of the Honorable Elizabeth S. Stong, United States Bankruptcy Judge at the United States Bankruptcy Court for the Eastern District of New York, Conrad B. Duberstein U.S. Courthouse, 271-C Cadman Plaza East, Brooklyn, New York 11201, Courtroom 3585 (such hearing will be telephonically as set forth below) on the **2nd day of December, 2022 at 10:30 a.m.**, or as soon thereafter as counsel may be heard (the “Hearing Date”).

PLEASE TAKE FURTHER NOTICE, that all hearings before Judge Stong will be conducted remotely, by telephone or video as the Court deems appropriate, until further notice. It is not necessary to contact the Courtroom Deputy to request prior authorization to appear remotely, whether via telephone or video. Please use eCourt Appearances to register to appear at a hearing. To register, please provide your name, address, e-mail address, telephone number on the hearing date, and if appropriate, the party that you represent. **Please be sure to register at least two business days before your hearing.** You will receive instructions on how to access the remote hearing via e-mail two business days before the hearing. On your hearing date, please connect at least ten minutes before your scheduled hearing time, and keep your audio and video on mute until your case is called. If you have a CM/ECF account, you may access eCourt

Appearances in the “Utilities” menu after logging into CM/ECF. If you do not have a CM/ECF account, you may access eCourt Appearances at <https://ecf.nyeb.uscourts.gov/cgi-bin/nyebAppearances.pl>. Additional information about eCourt Appearances, including a tutorial on how to use the program, is available at <https://www.nyeb.uscourts.gov/registering-remote-hearing-appearance-using-ecourt-appearances>. **Instructions to attend a telephonic hearing:**

1. **Dial in Number 888-808-6929**
2. **Access Code – 8523285#**
3. **State your name each time before speaking**
4. **Avoid the use of a speaker phone**
5. **If you are not speaking, keep your phone on mute**

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Application must be made in writing and filed with the Court and served upon and received by the undersigned no later than 5:00 p.m. on **November 25, 2022** (the “Objection Date”). If no objections are received by the Objection Date, the relief requested in the motion may be granted without a hearing.

Dated: New York, New York
November 16, 2022

BRONSTER LLP
Proposed Attorneys for Debtor

By: s//J. Logan Rappaport
J. Logan Rappaport
156 West 56th Street, Suite 902
New York, New York 10019
(212) 558-9300
lrappaport@bronsterllp.com